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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

New York City Opera, Inc.

Debtor.

Chapter 11

Case No. 13-13240 (SHL)

**NOTICE OF AGENDA OF MATTER SCHEDULED  
FOR HEARING ON JANUARY 20, 2015 AT 10:00 A.M.**

Date and Time of Hearing: January 20, 2015 at 10:00 a.m. (Prevailing Eastern Time)

Location of Hearing: United States Bankruptcy Court of the  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green, Room 701  
New York, New York 10004-1408

Copies of Pleadings: A copy of each pleading can be viewed on the Court's website at  
[www.ecf.nysb.uscourts.gov](http://www.ecf.nysb.uscourts.gov).

**I. CONTESTED MATTER**

1. Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, and Encumbrances [Docket No. 213]

**Response Deadline:** December 18, 2014 at 3:00 p.m. (as to approval of the Bidding Procedures Order)

January 12, 2015 at 11:00 a.m. (as to approval of the Sale Order)

**Responses Received:**

- a. Memorandum of Law of the Attorney General of the State of New York in Response to the Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, and Encumbrances [Docket No. 218]
- b. Objection of Gene Kaufman to Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, and Encumbrances [Docket No. 219]
- c. Limited Objection to Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, and Encumbrances filed by American Guild of Musical Artists, Local 802 of the American Federation of Musicians, and the American Federation of Musicians and Employers Pension Fund [Docket No. 231]
- d. Statement of Gotham Chamber Orchestra in Response to Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, and Encumbrances [Docket No. 233]
- e. Corrected Statement of Gotham Chamber Opera in Response to Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing

the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims, and Encumbrances [Docket No. 233]

**Related Documents:**

- a. Debtor's Motion for Order Shortening Time for Notice of Hearing to Consider Entry of Bidding Procedures Order [Docket No. 214]
- b. Order Shortening Time for Notice of Hearing to Consider Entry of Bidding Procedures Order [Docket No. 215]
- c. Certificate of Service regarding Docket No. 213 [Docket No. 216].
- d. Debtor's Reply to the Objection of Gene Kaufman to Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims and Encumbrances [Docket No. 224]
- e. Declaration of Andrea Scala Nellis, Managing Director of New York City Opera, Inc. in Further Support of Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims and Encumbrances [Docket No. 225]
- f. Certificate of Service regarding Docket Nos. 224, 225, 226 [Docket No. 227]
- g. Order Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date [Docket No. 228]
- h. Certificate of Service regarding Docket No. 228 [Docket No. 230]
- i. Debtor's Reply to the Limited Objection of The American Guild of Musical Artists, Local 802 of The American Federation of Musicians and the American Federation of Musicians and Employers Pension Fund to Debtor's Motion for Orders (I) Approving (A) Bidding Procedures, (B) Certain Bid Protections, (C) Form and Manner of Sale Notice, and (D) Sale Hearing Date, (II) Authorizing the Debtor to Enter into the Assigned Contract, and (III) Authorizing the Sale of Certain Assets Free and Clear of Liens, Claims and Encumbrances [Docket No. 235]
- j. Certificate of Service regarding Docket No. 235

**STATUS:** This matter is going forward.

Dated: January 19, 2015

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**

/s/ Nicole Stefanelli

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